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PATENT
Attorney Docket No.: 026595-006400US

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

Robert Degen et al.

Application No.: 10/091,000

Filed: March 4, 2002

For: Money Transfer Evaluation
Systems And Methods

Customer No.: 20350

Confirmation No.: 6763

Examiner: Cristina O. Sherr

Art Unit: 3621

**RESPONSE TO NOTIFICATION OF
NON-COMPLIANT APPEAL BRIEF**

Mail Stop Appeal Brief
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In response to the "Notification Of Non-Compliant Appeal Brief" mailed June 15, 2007, Applicants present the following concise explanation of the claimed subject matter. A concise explanation of independent claims 1, 16, 17, 23, 24 and 27 follow, which include exemplary references to sections of the specification and drawings supporting the subject matter defined in the independent claims as required by 37 C.F.R. § 41.37. The specification and drawings also include additional support for other exemplary embodiments encompassed by claimed and unclaimed subject matter. Thus, it should be appreciated that the references are intended to be illustrative in nature only.

The invention generally relates to technology for evaluating value transfers for suspect activities, such as, terrorist activities, money laundering, and the like. Application, page 2, lines 7-8. The various embodiments of the invention include receiving money transfers (Id. at page 2, lines 22-23) and grouping money transfers into groups based on similarities between sender identification and receiver identification. Id. at page 2, lines 15-16. Money transfers within groups are analyzed for suspect activity. Id. at page 2, lines 25-27.

The embodiment of claim 1 relates to a method for evaluating electronic value transfers. Id. at page 2, lines 6-7, and FIGS. 7A and 7B. According to this embodiment, a plurality of money transfer requests are received. Id. at page 2, lines 22-23. The money transfer requests include a first money transfer request and a second money transfer request. Id. at page 2, lines 13-17. The first money transfer request is associated with a first sender identification and the second money transfer request is associated with a second sender identification. Id. Records of the money transfer requests are electronically stored. Id. at page 2, line 23. An analysis is performed on the records that indicates whether the first sender identification and the second sender identification are related. Id. at page 2, lines 23-25. A reference designator is created. Id. at page 2, line 15, and FIGS. 5, 6 and 8. The reference designator is associated with the first sender identification and the second sender identification. Id. at page 2, lines 15-16. The reference designator is stored apart from the records of the money transfer requests. Id. at page 13, line 56, through page 14, line 3. The records of the money transfer requests are searched according to a specified criteria to determine if any of the money transfer requests associated with the reference designator are suspicious money transfer requests. Id. at page 2, lines 26-28. Suspicious money transfer requests are flagged. Id. at page 2, lines 28-29. The first sender identification may include a sender name, a sender number, an agent number, a sending data, a sending location, a sender phone number, a sending time, a sending message, or a sending amount. Id. at page 10, lines 20-32. The suspicious money transfer requests are selected from the following: (a) a transfer from a first sender to a second sender followed within a specified period by a transfer from the second sender to the first sender (Id. at page 2, lines 31-33); (b) a group of transfers from a sender to a group of receivers, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 2, lines 33-34); (c) one or more transfers

from a sender to a receiver, wherein the aggregate amount of the one or more transfers exceeds a specified level (Id. at page 2, line 34, through page 3, line 2); (d) a group of transfers from a group of senders to a receiver, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 3, lines 2-3); (e) two transfers from a first sender to a second sender that are followed within a specified period by corresponding transfers from the second sender to a receiver (Id. at page 3, lines 3-5); (f) two or more transfers from a sender to a receiver, wherein the two or more transfers are initiated from two or more distinct locations within a region (Id. at page 3, lines 5-7); and (g) two or more transfers from a sender to a receiver, wherein the two or more transfers are received at two or more distinct locations within a region (Id. at page 3, lines 7-9).

The embodiment of claim 16 relates to a method for evaluating electronic value transfers. Id. at page 2, lines 6-7, page 3, lines 10-11, and FIGS. 7A and 7B. According to this embodiment, a money transfer record is accessed. Id. at page 2, lines 9-11, and page 3, line 11. The money transfer record includes a sender identification and a receiver identification. Id. at page 2, lines 23-25. A master location identifier is assigned to the money transfer record. Id. at page 3, lines 11-12. The master location identifier is determined by one or both of the sender identification and the receiver identification. Id. at page 16, lines 7-10. The money transfer record is compared to a reference designator using a specified criteria. Id. at page 3, lines 12-13. A relationship between the reference designator and the money transfer record is indicated by one or more fields of the reference designator or the money transfer record. Id. at page 3, lines 13-15. The money transfer record is associated with the reference designator. Id. at page 3, lines 15-16.

The embodiment of claim 17 relates to a method for iteratively compiling suspicious money transfer activities from money transfer records. Id. at page 3, lines 17-18. According to this embodiment, a first money transfer record is accessed (Id. at page 3, line 19) and a first reference designator is provided (Id. at page 3, line 19). This first reference designator is associated with one or more of a sender identification and a receiver identification from a second money transfer record. Id. at page 2, lines 13-17. The first money transfer record is compared to the first reference designator using a specified criteria. Id. at page 3, lines 20-21.

The comparison indicates the first money transfer record is not related to the first reference designator. Id. at page 3, lines 21-22. A second reference designator is created that is associated with one or more of a sender identification and a receiver identification from the first money transfer record. Id. at page 3, lines 22-23. The first and second reference designators are maintained in a reference designator list apart from the first and second money transfer records, reducing the performance impact upon a money transfer system under evaluation. Id. at page 23, lines 11-15. The reference designator list is analyzed for suspicious money transfer activities. Id. at page 6, lines 6-8. The suspicious money transfer requests are selected from the following: (a) a transfer from a first sender to a second sender followed within a specified period by a transfer from the second sender to the first sender (Id. at page 2, lines 31-33); (b) a group of transfers from a sender to a group of receivers, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 2, lines 33-34); (c) one or more transfers from a sender to a receiver, wherein the aggregate amount of the one or more transfers exceeds a specified level (Id. at page 2, line 34, through page 3, line 2); (d) a group of transfers from a group of senders to a receiver, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 3, lines 2-3); (e) two transfers from a first sender to a second sender that are followed within a specified period by corresponding transfers from the second sender to a receiver (Id. at page 3, lines 3-5); (f) two or more transfers from a sender to a receiver, wherein the two or more transfers are initiated from two or more distinct locations within a region (Id. at page 3, lines 5-7); and (g) two or more transfers from a sender to a receiver, wherein the two or more transfers are received at two or more distinct locations within a region (Id. at page 3, lines 7-9).

The embodiment of claim 23 relates to a method for evaluating electronic value transfers. Id. at page 2, lines 6-7, and FIGS. 7A and 7B. According to this embodiment, money transfer requests are received (Id. at page 2, lines 22-23) that include a user identification associated with each of the money transfer requests. Id. at page 2, lines 13-17. The money transfer requests have also been grouped based on similarities between the user identifications. Records of the money transfer requests are electronically stored. Id. at page 2, line 23. The records of the money transfer requests are provided to a fraud processing computer. Id. at page

2, lines 12-13. An indication of a suspicious money transfer request is received that includes the user identification associated with the suspicious money transfer request. Id. at page 2, lines 26-29, and page 5, lines 25-29. The suspicious money transfer requests are selected from the following: (a) a transfer from a first sender to a second sender followed within a specified period by a transfer from the second sender to the first sender (Id. at page 2, lines 31-33); (b) a group of transfers from a sender to a group of receivers, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 2, lines 33-34); (c) one or more transfers from a sender to a receiver, wherein the aggregate amount of the one or more transfers exceeds a specified level (Id. at page 2, line 34, through page 3, line 2); (d) a group of transfers from a group of senders to a receiver, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 3, lines 2-3); (e) two transfers from a first sender to a second sender that are followed within a specified period by corresponding transfers from the second sender to a receiver (Id. at page 3, lines 3-5); (f) two or more transfers from a sender to a receiver, wherein the two or more transfers are initiated from two or more distinct locations within a region (Id. at page 3, lines 5-7); and (g) two or more transfers from a sender to a receiver, wherein the two or more transfers are received at two or more distinct locations within a region (Id. at page 3, lines 7-9).

The embodiment of claim 24 relates to a system for evaluating value transfers. Id. at page 2, lines 6-7, and FIGS. 7A and 7B. The system includes a fraud processing computer and a computer readable medium associated with the fraud processing computer. Id. at page 2, lines 12-13. The computer readable medium includes computer instructions executable by the fraud processing computer to access a first money transfer record. Id. at page 2, lines 13-15. The computer readable medium also includes computer instructions executable by the fraud processing computer to provide a first reference designator. Id. at page 2, lines 15-16. The first reference designator is associated with one or more of a sender identification and a receiver identification from a second money transfer record. Id. The computer readable medium also includes computer instructions executable by the fraud processing computer to compare the first money transfer record to the first reference designator using a specified criteria. Id. at page 2, lines 16-17 and 26-28. The comparison indicates that the first money transfer record is not

related to the first reference designator. Id. at page 2, lines 17-18, and page 3, lines 21-23. The computer readable medium also includes computer instructions executable by the fraud processing computer to create a second reference designator. Id. at page 2, lines 18-20. The first reference designator is associated with one or more of a sender identification and a receiver identification from the first money transfer record. Id. at page 3, lines 22-23. The first and second reference designators are maintained in a reference designator list apart from the first and second money transfer records, wherein a performance impact of the method upon a money transfer system under evaluation is reduced. Id. at page 23, lines 11-15.

The embodiment of claim 27 relates to a system for evaluating value transfers. Id. at page 2, lines 6-7, and FIGS. 7A and 7B. The system includes a money transfer system and a fraud processing server communicably coupled to the money transfer system. Id. at page 3, lines 9-20, page 9, lines 9-11, and FIGS. 1 and 2. The money transfer system includes money transfer records that are accessible by the fraud processing server. Id. at page 3, lines 9-11. The fraud processing server clusters related money transfer records separately from the money transfer records associated with the money transfer system. Id. at page 14, lines 31-32, and FIG. 2. The fraud processing server also clusters related money transfer records in order to use the clustered records to identify any suspicious money transfer requests. Id. at page 3, lines 9-11. The suspicious money transfer requests are selected from the following: (a) a transfer from a first sender to a second sender followed within a specified period by a transfer from the second sender to the first sender (Id. at page 2, lines 31-33); (b) a group of transfers from a sender to a group of receivers, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 2, lines 33-34); (c) one or more transfers from a sender to a receiver, wherein the aggregate amount of the one or more transfers exceeds a specified level (Id. at page 2, line 34, through page 3, line 2); (d) a group of transfers from a group of senders to a receiver, wherein the aggregate amount of the group of transfers exceeds a specified level (Id. at page 3, lines 2-3); (e) two transfers from a first sender to a second sender that are followed within a specified period by corresponding transfers from the second sender to a receiver (Id. at page 3, lines 3-5); (f) two or more transfers from a sender to a receiver, wherein the two or more transfers are initiated from two or more distinct locations within a region (Id. at page 3, lines 5-7); and (g) two or more

transfers from a sender to a receiver, wherein the two or more transfers are received at two or more distinct locations within a region (Id. at page 3, lines 7-9).

Respectfully submitted,

Date: July 2, 2007

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